

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	Civil Action No. 6:20-00952-ADA
BRAZOS LICENSING AND	§	Civil Action No. 6:20-00953-ADA
DEVELOPMENT,	§	Civil Action No. 6:20-00956-ADA
<i>Plaintiff</i>	§	Civil Action No. 6:20-00957-ADA
	§	Civil Action No. 6:20-00958-ADA
 v.	§	
 ONEPLUS TECHNOLOGY	§	
(SHENZHEN) CO., LTD.	§	
<i>Defendant.</i>	§	
	§	

**DECLARATION OF MICHAEL J. LYONS IN SUPPORT OF
DEFENDANT'S MOTION TO STRIKE PLAINTIFFS'
AMENDED INFRINGEMENT CONTENTIONS**

I, Michael J. Lyons, hereby declare as follows:

I am an attorney with the law firm Morgan, Lewis & Bockius LLP, counsel of record for Defendant OnePlus Technology (Shenzhen) Co., Ltd. ("Defendant" or "OnePlus") in the above captioned action and am admitted *pro hac vice* in this action. I have personal knowledge of the following facts. I have personal knowledge of the statements contained in this Declaration which are true and correct and, if called to testify as to the truth of the matters declared herein, I could and would testify competently thereto.

1. Attached hereto as **Exhibit 1** is a true and correct copy of WSOU Investments, LLC d/b/a Brazos Licensing and Development's ("WSOU")

preliminary infringement contentions for Case No. 6:20-cv-00-952-ADA (“-952 Case”), served May 18, 2021.

2. Attached hereto as **Exhibit 2** is a true and correct copy of WSOU’s preliminary infringement contentions for Case No. 6:20-cv-00-953-ADA (“-953 Case”), served May 18, 2021.

3. Attached hereto as **Exhibit 3** is a true and correct copy of WSOU’s preliminary infringement contentions for Case No. 6:20-cv-00-956-ADA (“-956 Case”), served May 18, 2021.

4. Attached hereto as **Exhibit 4** is a true and correct copy of WSOU’s preliminary infringement contentions for Case No. 6:20-cv-00-957-ADA (“-957 Case”), served May 18, 2021.

5. Attached hereto as **Exhibit 5** is a true and correct copy of WSOU’s preliminary infringement contentions for Case No. 6:20-cv-00-958-ADA (“-958 Case”), served May 18, 2021.

6. Attached hereto as **Exhibit 6** is a true and correct copy of OnePlus’s May 28, 2021 letter to WSOU.

7. Attached hereto as **Exhibit 7** is a true and correct copy of OnePlus’s June 2, 2021 letter to WSOU.

8. Attached hereto as **Exhibit 8** is a true and correct copy of OnePlus’s June 9, 2021 email correspondence to WSOU.

9. Attached hereto as **Exhibit 9** is a true and correct copy of email correspondence between the parties and the Court on October 12, 2021 and October 13, 2021.

10. Attached hereto as **Exhibit 10** is a true and correct copy of WSOU's amended infringement contentions for the -952 Case, served October 26, 2021.

11. Attached hereto as **Exhibit 11** is a true and correct copy of WSOU's amended infringement contentions for the -953 Case, served October 26, 2021.

12. Attached hereto as **Exhibit 12** is a true and correct copy of WSOU's amended infringement contentions for the -956 Case, served October 26, 2021.

13. Attached hereto as **Exhibit 13** is a true and correct copy of WSOU's amended infringement contentions for the -957 Case, served October 26, 2021.

14. Attached hereto as **Exhibit 14** is a true and correct copy of WSOU's amended infringement contentions for the -958 Case, served October 26, 2021.

15. Attached hereto as **Exhibit 15** is a true and correct copy of a redline comparison of WSOU's preliminary and amended infringement contentions for the -952 Case, as performed by the Litera "Workshare Compare" software program.

16. Attached hereto as **Exhibit 16** is a true and correct copy of a redline comparison of WSOU's preliminary and amended infringement contentions for the -953 Case, as performed by the Litera "Workshare Compare" software program.

17. Attached hereto as **Exhibit 17** is a true and correct copy of a redline

comparison of WSOU's preliminary and amended infringement contentions for the -956 Case, as performed by the Litera "Workshare Compare" software program.

18. Attached hereto as **Exhibit 18** is a true and correct copy of a redline comparison of WSOU's preliminary and amended infringement contentions for the -957 Case, as performed by the Litera "Workshare Compare" software program.

19. Attached hereto as **Exhibit 19** is a true and correct copy of a redline comparison of WSOU's preliminary and amended infringement contentions for the -958 Case, as performed by the Litera "Workshare Compare" software program.

20. Attached hereto as **Exhibit 20** is a true and correct copy of November 9, 2021 and November 10, 2021 email correspondence between OnePlus and WSOU.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24rd day of November 2021, in Los Altos, California

/ Michael J. Lyons
Michael J. Lyons